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October 1, 1993

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Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
Stop Code 1170  
1919 M Street, N.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Rules For the Filing of International  
Circuit Status Reports  
CC Docket No. 93-157

Dear Mr. Caton:

Enclosed for filing with the Commission are an original and four copies of the Reply Comments of American Telephone and Telegraph Company in the above-referenced proceeding.

Kindly acknowledge receipt of this document by date-stamping the extra copy furnished herewith for that purpose and returning a copy to bearer.

Very truly yours,

*M. Andrew Donnelly*

cc: Mr. Robert E. Gosse

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )  
 ) CC Docket No. 93-157  
Rules For the Filing of International )  
Circuit Status Reports )

REPLY COMMENTS OF AT&T

American Telephone and Telegraph Company ("AT&T") files these Reply Comments, pursuant to the Commission's Notice of Proposed Rulemaking ("NPRM"), released July 2, 1993. AT&T recommends that certain filing details proposed by other carriers in this proceeding, would be best left for resolution during development of the Commission's proposed filing manual, with appropriate consultation among the Commission Staff and affected carriers. AT&T also supports the proposal to eliminate semi-annual circuit additions reports, currently required under Commission Rule 63.10, but suggests that such action not delay implementation of Rule 43.82 proposed in the NPRM.

AT&T filed Comments on September 1, 1993, supporting the Commission's proposals included in the NPRM, subject to the affected carriers being afforded a reasonable opportunity to provide input into the development of the filing manual, and a clarification that IMTS and private line remain the relevant service categories for Circuit Status Reports.

### Discussion

Two of the carriers filing comments, MCI Telecommunications Corporation ("MCI") and GTE Service Corporation ("GTE"), have proposed the imposition of certain details in the reporting requirements, that are not necessary to meet the Commission's objectives and would make reporting of analog circuits more confusing.<sup>1</sup> MCI states that it reports analog circuits as "single circuits capable of transmission speeds up to 9.6 Kb/s," and that such "bandwidth level" is used by all carriers providing international service.<sup>2</sup> MCI proposes that this measurement be required as the standard for reporting purposes.<sup>3</sup> The difficulty with this proposal is that it would have analog circuits being reported according to digital measurements that do not apply. Digital transmission facilities are identified on the basis of bit rates, whereas analog facilities are identified on the basis of bandwidth.<sup>4</sup> AT&T reports analog circuits as 3 KHz and 4 KHz transmission

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<sup>1</sup> Comments of GTE (Sept. 1, 1993); MCI Comments (Sept. 1, 1993).

<sup>2</sup> MCI Comments, p. 4-5.

<sup>3</sup> Id.

<sup>4</sup> Further confusing the matter is that digital signals of any number of different bit rates, can each be converted to analog signals of any number of different bandwidths.

medium, and submits that this is an appropriate manner for reporting for future Circuit Status Reports.

GTE proposes a requirement that capacity be reported in equivalent 64 Kb/s circuits rather than equivalent voice-grade circuits, to reflect the transmission of both voice and high speed data.<sup>5</sup> The implications and benefits of this proposal are unclear. Although AT&T reports wideband services such as Skynet® and IADS on a 64 Kb/s equivalent basis, AT&T reports other digital facilities on the basis of equivalent voice-grade circuits.

The proposals of MCI and GTE represent new details that are not reflective of the manner in which all carriers maintain data. Accordingly, such proposals would require carriers to make changes in their data collection systems, for purposes of Circuit Status Reports. As AT&T has proposed in its Comments, implementation of these or other such details should not occur without appropriate consultation among the Commission Staff and affected carriers.<sup>6</sup> The various comments filed by others in this proceeding also underscore the need for some flexibility in development and updating of filing requirement details.<sup>7</sup> Development of the filing manual proposed by the Commission,

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<sup>5</sup> Comments of GTE, p. 3.

<sup>6</sup> See Comments of AT&T, p.1, 3-4.

<sup>7</sup> See, e.g., Comments of Sprint Communications Company, L.P. ("Sprint"), p. 3-4 (Sept. 1, 1993).

with appropriate input from affected carriers, would lend itself to optimal development of such details. AT&T suggests that details of bit rate and bandwidth identification (or modification) be addressed in the context of development of the proposed filing manual.

IDB Communications Group, Inc. ("IDB"), has filed comments requesting that the Commission adopt a definition of facilities-based carriers that will better serve other proceedings or policies of the Commission, such as the international private line resale policy.<sup>8</sup> AT&T believes that the formulation of a definition of facilities-based carriers, with a view towards satisfying objectives not germane to Circuit Status Reports, would unnecessarily complicate matters concerning the Circuit Status Reports. We suggest that the Commission's final Order, reiterate for clarification, that the expression "facilities-based carrier" as used in Rule 43.82, is used only in the context of identifying which carriers are required to file Circuit Status Reports. Accordingly, for purposes of Rule 43.82, facilities-based carriers are those international common carriers which acquire international transmission facilities on an ownership or indefeasible right of use basis or lease satellite capacity from COMSAT or a separate satellite system.<sup>9</sup>

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<sup>8</sup> Comments of IDB, (Sept. 1, 1993).

<sup>9</sup> See NPRM, p. 1, n. 2.

Finally, certain carriers have proposed elimination of the semi-annual circuit additions reports required under Commission Rule 63.10.<sup>10</sup> This proposal is based on the fact that information contained in the circuit additions reports is already included in the Circuit Status Reports. AT&T supports the proposal to eliminate the duplicative circuit additions reports, but urges that such action not delay the Commission's implementation of proposed Rule 43.82 as set forth in the NPRM.

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<sup>10</sup> Comments of GTE, p. 3; MCI Comments, p. 5-6; Comments of Sprint, p. 4.

Conclusion

AT&T supports the proposals included in the NPRM and recommends their implementation, subject to a reasonable opportunity for input by affected carriers on matters of details with respect to the proposed filing manual. AT&T recommends that new filing details proposed by certain commentors, such as bit rate and bandwidth identification, are best left for development as part of the filing manual. AT&T is prepared to work with the Commission Staff in developing an appropriate filing manual.

Respectfully submitted,  
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October 1, 1993

CERTIFICATE OF SERVICE

I, Catherine Houston, do hereby certify that a copy of American Telephone and Telegraph Company's Reply Comments, dated October 1, 1993, has been sent by United States mail, postage prepaid, to the following:

  
Catherine Houston

Dated: October 1, 1993



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